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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

JOSHUA KUCHERKA,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:24-cv-00385-AC

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND BRIEFING SCHEDULE**

The parties stipulate through counsel that Defendant, the Commissioner of Social Security (the “Commissioner”), shall have an extension of 10 days to respond to Plaintiff’s Motion for Summary Judgment in this case. In support of this request, the Commissioner respectfully states as follows:

1. The Commissioner’s response to Plaintiff’s Motion for Summary Judgment is due July 10, 2024. Defendant previously received one extension of this deadline.

2. Counsel for the Commissioner is awaiting a response from his client on whether settlement of this matter may be appropriate. Counsel for the Commissioner believes that this short extension may resolve this matter without necessitating this Court to address the merits of this matter. Moreover, this brief extension would conserve judicial time and resources should the Parties be able to resolve this matter.

3. Counsel for the Commissioner has consulted with Plaintiff’s counsel who advised that he has no objections.

4. This request is made in good faith and is not intended to unnecessarily delay the proceedings in this matter.

WHEREFORE, Defendant requests until July 20, 2024, respond to Plaintiff’s Motion for Summary Judgment.

Date: July 9, 2024

UNITED DISABILITY LAW GROUP

By: /s/ Kevin Heitke*
KEVIN HEITKE
*Authorized by email on July 9, 2024
Attorneys for Plaintiff

Date: July 9, 2024

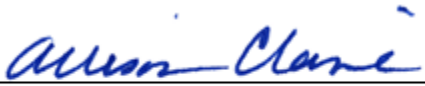
PHILIP A. TALBERT
United States Attorney
Eastern District of California

By: /s/ Caspar Chan
CASPAR CHAN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

DATED: July 9, 2024.



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE